OCT 19 1949
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CROSS PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS FOR THE FOURTH CIRCUIT

SUPREME COURT of the UNITED STATES

OCTOBER TERM, 1949

No. 407

NICHOLAS KORTHINOS, EVANGELOS FRANGAKIS, NICHOLAS GALEOS, KONSTANTINE MANOUSOS, JOHN KARAGIANOS, VASILIOS STATHIS, GEORGE LEMONIS, THEODORE ORBHANIDIS, PANGIOTIS LAZAROU, GEORGE XENOS, FORTIS KATSIKAS, VASSILIOS KONTOULAS, NICHOLAS VENIERIS, STAVROS HADJITHERODROU, THEOFRASTOS MELLISSARATOS, ELEFTERIOS ECONOMIDES, CONSTANTINE FOROS,
Petitioners—Cross-respondents,

vs.

S. S. NIARCHOS, as Owner, MICHAEL PILIAROS, his Agent, and GERASSIMOS PANAS, as Master; all being interested in the operation of the Steamship "CAPT. K. PAPAZOGLOU",
Respondents—Cross-petitioners.

GEORGE M. LANNING,
BARRON F. BLACK,
HUGH S. MEREDITH,
Counsel for Petitioners.

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CROSS PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS FOR THE FOURTH CIRCUIT

To The Honorable, the Chief Justice and Associate Justices of the Supreme Court of the United States:

Your cross-petitioners, S. S. Niarchos, Michael Piliaros and Gerassimos Panas, pray for a Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit to review a final judgment of that Court. Your cross-petitioners will be hereinafter referred to as "respondents" and the cross-respondents named above as "libellants".

The opinion of the Court below is reported in 175 Fed. (2d) 730, and 1949 A. M. C. 1135. The District Court opinion is reported only in 1948 A. M. C. 1676, but may be found in Appellants' Appendix in the court below (Appellants' App. S, 113) which forms a part of the appendix record in this case. Since this is a seaman's appeal and the record has not been printed, references will be made to the particular appendix concerned.

SUMMARY STATEMENT OF THE MATTER INVOLVED

This proceeding arises out of a sit down strike on board the Greek S/S CAPT. K. PAPAZOGLOU while she was in the port of Hampton Roads, Virginia, during the month of March, 1948. As the result of their unauthorized conduct, the strikers were discharged, but they refused to leave the vessel. The owner thereupon filed a possessory libel against the vessel to effect their removal (Appellees' App. 3). Simultaneously with the filing by the owner of the possessory libel, the seamen

themselves filed a libel against the owner, the master, and one Michael Piliarios, the Greek Consular representative who had authorized their discharge (Appellees' App. 1). The seamen's libel alleged damages under the Greek law for unjustified discharge plus any wages due them. An immediate hearing was had as a result of which the prayer of the owner's possessory libel was granted and the seamen were ordered off the ship. Thereafter on April 20, 1949, long after the wages due the seamen on discharge had been deposited in Court and drawn out by the seamen concerned, proctors for the libellants filed fourteen interrogatories addressed to the respondents (Appellees' App. 9). Respondents answered certain of these interrogatories and filed exceptions as to the others (Appellants' App. F., G., 85, 87). The District Court sustained these exceptions giving its reasons therefor in two written memoranda (Appellants' App. H., I., 88, 90). The case then proceeded to trial on the merits, upon the completion of which the libel against respondents was dismissed (Appellants' App. R., 112). The seamen then appealed to the Court of Appeals for the Fourth Circuit. The Court of Appeals affirmed the District Court on all points except the one involving respondents' exceptions to the first interrogatory. This interrogatory is worded as follows:

> "List the advances made to each of the libellants from the time of employment until the libellants were forced to leave the vessel, giving the name of the libellant to whom the advance was made, the date, the place, and the amount of the advance. Verify this list by furnishing the respective wage accounts of each of the libellants, covering each voyage from the time of employ-

ment until the libellants were forced to leave the vessel."

The District Court sustained respondents' exceptions to this interrogatory on the grounds, among others set forth in the two memoranda of the District Court, that the libellants had made no showing of any justification for the production of this data, and that respondents were entitled to claim their privilege against self-incrimination. This interrogatory seeks the discovery of advances made contrary to Title 46, U. S. Code, Section 599, which section, in addition to granting a civil cause of action, provides for a penalty involving fine and imprisonment for anyone paying a seaman wages in advance of the time that he has earned the same. On appeal the Court of Appeals for the Fourth Circuit reversed the District Court, ruling that this interrogatory should be answered.

In reversing the District Court the Court of Appeals did not comment on libellants' failure to show any justification for the production of this data, but instead confined its discussion to the self-incrimination plea.

> " . . . It appears that in the case of the *Papazoglou*, the seamen have obtained the information as to wage payments sought by interrogatory. If upon the further hearing of the case, however, the answer to the interrogatory should become material, we see no reason why the vessel should not be required to answer it. The inquiry is unquestionably relevant and the privilege against self incrimination has no application to the records of a vessel, which are not the private records of the person making them which

> the constitutional provision would protect. See *White* v. *United States*, 322 U. S. 694, 700." (175 Fed. (2d) 730, 734).

Here the Court of Appeals says that it appears that the seamen have already obtained this information. They are referring to the fact that the Circuit Court for the City of Newport News, Virginia, in an identical suit between the same parties, required the respondents to produce the same wage accounts, which are sought here. They were produced, however, pursuant to court order and over respondents' objections, hence, it cannot be said that they were voluntarily relinquished. Furthermore, they were not produced in the state court until after the trial on the merits in the District Court.

These accounts were prepared by the master in three copies. The original was sent to the owner, the second copy given to the seaman concerned, and the third copy retained by the master. A sample copy of the wage account form used by the master of the S/S "CAPT. K. PAPAZOGLOU" is attached to the brief accompanying this petition. The original accounts covering the voyage ending on March 10, 1948, are already in evidence (Panas Ex. 2, 3).

JURISDICTION

The jurisdiction of this court is invoked under Title 28, U. S. Code, Sections 1254, 2101, and Rule 38 of the General Rules of the Supreme Court of the United States. The judgment of the Court of Appeals was rendered on May 17, 1949, and a timely petition for rehearing was filed, which was denied on July 21, 1949.

THE QUESTIONS PRESENTED

The questions presented by this petition are as follows:

1. Did the Court of Appeals err in ruling that this interrogatory must be answered without considering whether this information could not have been obtained from the seamen themselves?

2. Did the overruling of respondents' exceptions here amount to a violation of their privilege against self-incrimination as granted by the Fifth Amendment to the Constitution of the United States, and set out in General Admiralty Rule 30?

REASONS RELIED ON FOR THE ALLOWANCE OF THE WRIT

Respondents rely on the following reasons for the allowance of a Writ of Certiorari:

1. The Court of Appeals for the Fourth Circuit has rendered a decision in conflict with the decision of this Court in *Hickman* v. *Taylor*, 329 U. S. 495, in ruling that this interrogatory should be answered even though there has been no showing of justification for the production of this data.

2. In ruling that this interrogatory must be answered and that the documents called for therein must be produced, even though respondents have claimed their constitutional privilege against self-incrimination, the Court of Appeals has decided a Federal question in conflict with the decisions of this court in *Boyd* v. *U. S.*, 116 U. S. 616; *Ballman* v. *Fagin*, 201 U. S. 186; and other cases cited in the brief filed in support of this petition.

3. In ruling that the wage accounts of the crew of a foreign ship are not the private records of the person making them, which the constitutional provision protects, the Court of Appeals has decided an important question of federal law which has not been, but should be, decided by this court.

WHEREFORE, your petitioners respectfully pray that a Writ of Certiorari be issued out of this Honorable Court directed to the United States Court of Appeals for the Fourth Circuit commanding said court to certify and send to this Court for its review and determination a full and complete transcript of the record and all proceedings in the case numbered and entitled on its docket as number 5844, *Nicholas Korthinos et als.* v. *S. S. Niarchos et als.*, and that the said judgment of the Court of Appeals for the Fourth Circuit be reversed by this Honorable Court, and that your petitioners may have such other and further relief in the premises as to this Honorable Court may seem meet and just; and your petitioners will ever pray.

October , 1949.

S. S. NIARCHOS, MICHAEL PILIAROS, and GERASSIMOS PANAS.

By:

GEORGE M. LANNING,
BARRON F. BLACK,
HUGH S. MEREDITH,
Counsel for Petitioners.

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SUPPORTING BRIEF

OPINIONS OF THE COURTS BELOW

The opinion of the Court of Appeals is reported in 175 Fed. (2d) 730, and 1949 AMC 1135. The District Court's opinion is reported in 1948 AMC 1676 and may

be found in the appendix to Appellants' brief in the court below (Appellants' App. S, 113), which forms a part of the Appendix record in this court.

JURISDICTION

A timely petition for rehearing was filed in the court below and was denied on July 21st, 1949. The grounds on which the jurisdiction of this court is invoked are stated in the petition at page 5.

STATEMENT OF THE CASE

The essential facts are stated in the petition at page 2.

SPECIFICATION OF ERRORS

The Court of Appeals for the Fourth Circuit erred in the following respects:

1. In ruling that this interrogatory should be answered even though libellants have made no showing of justification or necessity for the production of this data.

2. In ruling that this interrogatory should be answered even though respondents have claimed their privilege against self incrimination.

3. In finding and holding that the wage accounts involved here are not the private records of the person making them which the constitutional provision protects.

4. In failing to find that the wage accounts concerned here are the private records of the master and owner.

5. In holding that under *U. S.* v. *White*, 322 U. S. 694, these records must be produced.

6. In reversing the District Court's ruling on this interrogatory.

ARGUMENT

It is the purpose of this argument to show that the Court of Appeals, in the errors specified against it, has decided an important question of federal law in conflict with the decisions of this court, or if not in conflict with said decisions has decided an important question of federal law which should be settled by this court.

SUMMARY

I. There has been no showing here of any justification or necessity for the production of this data as required by *Hickman* v. *Taylor*, 329 U. S. 495, 509.

II. To be required to answer this interrogatory would be a violation of respondent's constitutional privilege against self-incrimination.

(1) To list these advances would subject respondents to criminal prosecution.

(2) These wage accounts are the private records of the master and owner, and the doctrine of *U. S.* v. *White* is not applicable thereto.

(3) These wage accounts are not public records as to which no constitutional privilege attaches.

(4) There has been no disclosure that amounts to a waiver of this privilege.

I. NO JUSTIFICATION HAS BEEN SHOWN

Attorneys for libellants have made no effort to show

that the information sought by this interrogatory could not have been obtained direct from their own clients for the asking. During the hearing on the possessory libel and during the course of the depositions which followed, several of the libellants testified, and the others were present, but even though the opportunity existed, no questions were directed toward ascertaining what, if any, advances had been made. Obviously here these advances were an afterthought. Libellants might just as well have asked, "Do you owe me any money? If so, when and where did the debt arise? What is the amount?" If libellants themselves do not have any information as to these alleged advances, then they can certainly have no personal convictions as to these matters. At the end of each voyage they received without objection copies of the same wage accounts that are sought here. Likewise they accepted without objection the amounts shown to be due on said accounts, and receipted in full for all wages due.

In *Hickman* v. *Taylor*, 329 U. S. 495, 509, this court held that all interrogatories do not have to be answered as a matter of right and that a party is not entitled to the discovery of documents without a showing of "good cause". It is significant to note the language of the late Mr. Justice Murphy in this case:

> " . . . We are thus dealing with an attempt to secure the production of written statements and mental impressions contained in the files and the mind of the attorney Fortenbaugh without any showing of necessity or any indication or claim that denial of such production would unduly prejudice the preparation of petitioner's case or cause him any hardship or injustice. For aught

that appears, the essence of what petitioner seeks either has been revealed to him already through the interrogatories or is readily available to him direct from the witness for the asking." (p. 509)

* * *

" . . . No attempt was made to establish any reason why Fortenbaugh should be forced to produce the written statements. There was only a naked, general demand for these materials as of right and a finding by the District Court that no recognizable privilege was involved. That was insufficient to justify discovery under these circumstances, and the court should have sustained the refusal of the tug owners and Fortenbaugh to produce." (p. 512).

In the instant case, as in *Hickman* v. *Taylor*, supra, there has been no attempt to give any reason why these accounts should be produced, but only a "naked, general demand" therefor. It is earnestly submitted that the Court of Appeals erred in ruling that the libellants are entitled to this information as a matter of right. A stronger case exists here for not requiring respondents to divulge information which is readily available from the libellants themselves, than in a case where it must be obtained from third party witnesses as in the Hickman case.

II. SELF INCRIMINATION

There is no doubt but that libellants are here seeking the discovery of advances made contrary to Title 46 U. S. Code, Section 599. This section is worded in part as follows:

> "(a) It shall be unlawful in any case to pay any seaman wages in advance of the time when he has actually earned the same . . . Any person violating any of the foregoing provisions of this section shall be deemed guilty of a misdemeanor, and upon conviction shall be punished by fine of not less than twenty five Dollars nor more than One Hundred Dollars, and may be imprisoned for a period of not exceeding six months at the discretion of the court . . . "

Libellants' proctors have already been furnished with information pertaining to the dates and places of libellants' employment, the amount of their wages, etc., and they now seek to have respondents admit that certain advances were made in the United States before the seamen concerned had had an opportunity to earn the amount of the advance.

Respondents have claimed their constitutional privilege by excepting to this interrogatory on the grounds that to be required to answer the same would tend to incriminate them. There is no question but that this privilege can be claimed in this manner. General Admiralty Rule 30 provides as follows:

> "Either party may object by proper pleadings to answering any allegation contained in any pleading or interrogatory filed by the other party, which will tend to expose him, it or them to any prosecution or punishment for crime or for any penalty or any forfeiture of his, its or their property for any penal offense."

This procedure was followed in *Re Knickerbocker*

Steamboat Company (*The General Slocum*), 139 Fed. 713 (SDNY). See also *Pollack* v. *The Laura*, 5 Fed. 133, Aff. 114 U. S. 411, wherein it was invoked by a refusal to answer the allegations of a libel.

(1) To list these advances would subject the respondents to criminal prosecution.

The first part of this interrogatory calls on the respondents to *list* all advances made during the whole period of libellants' employment, giving the date, the place, the amount, etc. To require respondents to list this information would be to require them to divulge information which could later be used against them in criminal prosecutions.

The rule is well established that the Fifth Amendment to the Constitution, which protects persons against being compelled to give evidence against themselves must be given a broad construction in favor of the right which it was intended to secure. *Gouled* v. *U. S.*, 255 U. S. 298; *Arndstein* v. *McCarthy*, 254 U. S. 71; *Counselman* v. *Hitchcock*, 142 U. S. 547; *Boyd* v. *U. S.*, 116 U. S. 616. Nor is there any question but that this protection applies equally as well to civil as it does to criminal proceedings. *Arndstein* v. *McCarthy*, 266 U. S. 34.

The Court of Appeals failed to comment on the first portion of this interrogatory which boldly requests the respondents to *list all advances made*, but instead confined its discussion to the second portion, which deals with the production of the wage accounts. The Court of Appeals has ruled that this interrogatory must be answered on the authority of *U. S.* v. *White*, supra. Certainly this case, which deals solely with the production of documents, is no authority for the holding that

all advances must be listed. To require respondents to comply with so bold a request would amount to saying that no constitutional privilege exists as to them.

> (2) These wage accounts are the private records of the master and owner, and the doctrine of *U. S.* v. *White* is not applicable thereto.

The second part of this interrogatory calls on respondents to produce the wage accounts of each of the libellants. The Court of Appeals in its opinion states that "The privilege against self-incrimination has no application to the records of a vessel, which are not the private records of the person making them, which the constitutional provision would protect", and has cited *U. S.* v. *White*, supra, in support of this statement.

At the outset it should be noted that the wage accounts which are called for here are no more the records of the vessel than are the accounts of an individual's business the records of the business, and not his own records. There is no association here such as the labor union which was dealt with in *U. S.* v. *White*. All we have is a private individual owning a vessel who has turned over the custody of his vessel to another individual to operate it. The owner obtains business for his vessel, and the master operates it. At the end of each voyage the master pays the crew out of money furnished to him by the owner. The master prepares the crew's wage accounts in triplicate, using one sheet for each man, and when they are paid off, the individual concerned is given one copy, one copy is sent to the owner, and the third copy is retained by the master. When the master leaves the ship to go to another ship or to go home, he takes these accounts with him so that he will always have them

available in case some dispute arises as to how he has spent the owner's money. If these accounts are not the private property of the master and the owner, then whose property are they? It is impossible for a vessel to own any property, hence no comparison can be made between a vessel and an association such as that found in *U. S.* v. *White*, supra. Neither can there be any comparison between a vessel and a corporation such as the Supreme Court was concerned with in *Hale* v. *Henkel*, 201 U. S. 43. None of the reasons which were given by this court in *U. S.* v. *White*, supra, for extending the corporation doctrine to include labor organizations are applicable to the instant case. In the White case this court set up a test by which it may be determined whether a particular *organization* can invoke this privilege. The test is worded as follows:

> "The test, rather, is whether one can fairly say under all the circumstances that a particular type of organization has a character so impersonal in the scope of its membership and activities that it can not be said to embody or represent the purely private or personal interests of its constituents, but rather to embody their common or group interests only." (p. 701).

Certainly there is no similarity between a vessel, such as the "CAPTAIN K. PAPAZOGLOU" and an organization composed of many members with activities and property of its own.

The operation of the "CAPT. K. PAPAZOGLOU" can be compared to any small individually owned business, and there is no question but that this privilege can be invoked by the owner of such a business. *Boyd* v.

U. S., supra; *Ballman* v. *Fagin*, 200 U. S. 186. But even if we go so far as to say that its operation is comparable to that of a small business partnership, this privilege can still be invoked by either or all of the partners. In *U. S.* v. *Brasley*, 268 Fed. 59, the U. S. District Court for the Western District of Pennsylvania held that three individuals engaged in the operation of a retail shoe store could claim this privilege. Our remaining inquiry, then, is how far has this privilege been limited by *U. S.* v. *White*, supra. We have read all of the cases in which *U. S.* v. *White*, supra, has been cited, and have found only one case in which an attempt was made to apply its doctrine to a small business partnership. This case, *In re Subpoena Duces Tecum No. 6895*, 81 Fed. Supp. 418 (N. D. Cal.) (1948), dealt with a subpoena which had been issued against one of the partners of a small family partnership for the production of certain partnership records. The other partners made a motion to quash on the ground that the production of said records would violate their privilege against self-incrimination. The partner producing the records was protected against incrimination by an immunity statute, hence his privilege was not before the Court. The Court in holding that the doctrine of *U. S.* v. *White* was inapplicable to the records of such a partnership had the following to say at page 420:

> "(2) In general, it may be properly said that each partner in a partnership is a co-owner of all partnership property with equal rights of possession and with *no other* power of possession without the consent of the other partners. 47 C. J. 783; Sec. 2419 Civil Code of California. While ownership and possession is shared, it is none

the less personal. It cannot be denied that the records here subpoenaed are the common personal papers of the partners.

"It is contended by the Government, in effect, that the partnership is an association or entity of the association type and that the partners, in creating it, relinquished their several sole and exclusive rights to severally possess its property and papers. It is further contended that by the creation of the partnership, each partner has put it within the power of the other partners to have possession and control of the partnership records, thus disabling himself from the benefits of the Fourth Amendment. The partnership is a collective group, the Government says, which by pooling separate individual financial resources, acquires an economic power not previously possessed by the partners individually.

"(3, 4) But the '*right of the people* to be secure in their persons, houses, papers, and effects' is recognized and protected by the Fourth Amendment. While the right is personal, it is not so limited that more than *one* person may not exercise it with respect to the same papers or effects. It is only when a group or association of persons is 'so impersonal in the scope of its membership and activities that it cannot . . . represent the purely private or personal interests of its constituents,' that the right is unavailable.

"(5) I am of the opinion that the doctrine of *United States* v. *White*, supra, cannot be extended to the members of a partnership such as 'O. Casperson & Sons,' whose only purpose is to

conduct the personal business of the partners and to divide and share their profits and losses for their mutual benefit and protection."

It is argued by libellants that the owner cannot claim this privilege since the master is the one who paid the advances and who made out the wage accounts. The master here was expending the owner's money, and the owner was furnished with a copy of the accounts. Certainly these accounts are as much the private records of the owner as they are of the master. The owner, himself, as well as the master, is made liable for the penalty under the statute, and it is his privilege and not the privilege of the master that he has claimed.

3. These wage accounts are not public records as to which no constitutional privilege attaches.

Libellants argue that the respondents are required by Title 46, U. S. Code Section 642 to keep such records, and hence they are *public records* as to which no privilege attaches. They have cited *Shapiro* v. *U. S.*, 335 U. S. 1 (1948), in support of this position. *Shapiro* v. *U. S.* was a five to four decision of this court in which it was held that certain business records which were required to be kept by the Emergency Price Control Act were public records as to which no constitutional privilege attached. Even if this case was applicable in other respects, there is no provision in this statute requiring masters of foreign ships to keep such accounts. Title 46, U. S. Code, Section 642 does not apply to masters of foreign vessels. This section provides that "every master" before paying off or discharging any seaman, shall deliver to him or to the Shipping Commissioner a

full and true account of his wages, and Title 46, U. S. Code Section 713 defines the word "master" as used in this section as being "every person having command of any vessel belonging to *any citizen of the United States*". Since the "CAPTAIN K. PAPAZOGLOU" is owned by an alien, it is obvious that this section is not applicable to the instant case. Those portions of the Seaman's Act which do apply to foreign owned ships while in American waters, such as Title 46 U. S. Code, Sections 597 and 599, specifically so provide. The law is well settled that American statutes of this type apply to foreign owned ships only when they expressly so provide. *The Hannover*, 248 N. Y. 231, 162 N. E. 15; *The Elswick Tower*, 241 Fed. 706 (SDGa.); *The Montapedia*, 14 Fed. 427 (DCLa.); *U. S.* v. *Kellum*, 7 Fed. 843 (CCNY).

4. There has been no disclosure that amounts to a waiver of this privilege.

Nor can it be said that there has been a disclosure here that amounts to a waiver of this privilege. It is argued by proctors for libellants that since the libellants were each furnished with a copy of their wage accounts at the time that they were paid off, respondents thereby waived this privilege. The case of *Arndstein* v. *McCarthy* went to the Supreme Court three times. The decisions are found at 254 U. S. 71, 262 U. S. 355, and 266 U. S. 34. In the first case it was argued that Arndstein, a bankrupt, had waived his privilege against being questioned as to the assets of his estate after he had furnished a schedule of said assets, but this court held that there had been no such waiver. In the second case, it was argued that since Arndstein had answered

certain questions as to the assets of his estate, he could not thereafter refuse to answer other related questions, but this court again held that there had been no disclosure which would prevent his claiming this privilege. The third case held that this privilege was properly applicable to a civil bankruptcy proceeding in which the discovery of a bankrupt's estate was sought. Certainly, if it is applicable to the discovery of a bankrupt's estate, it is applicable to the discovery of respondents' estate in the instant case.

CONCLUSION

It is respectfully submitted that the Court of Appeals has rendered a decision in conflict with *Hickman* v. *Taylor*, supra, in holding that this interrogatory must be answered as a matter of right even though there has been no showing of justification. It is further submitted that the Court of Appeals, insofar as it has overruled respondents' exceptions to this interrogatory on the grounds of self incrimination, has decided a federal question which, if not in conflict with *Boyd* v. *U. S.*, supra; *Ballman* v. *Fagin*, supra, and other cases cited herein, is an important question of constitutional law which should be decided by this court.

The Court of Appeals has extended the doctrine of *U. S.* v. *White*, supra, far beyond its clear meaning. To apply this doctrine to the private business records of the master and owner of a vessel such as the "CAPTAIN K. PAPAZOGLOU", constitutes a complete wiping out of the constitutional privileges of these two individuals, who have elected to operate a ship rather than to sell coal or peanuts. Surely, the type of business an in-

dividual engages in cannot logically determine his right to be protected under the constitution.

The question is directly posed as to whether shipowners and masters are to be placed in a separate class, the members of which are not to have the benefit of the constitutional provision against self-incrimination. In this respect we submit that the case is one of vital importance.

This court has always been diligent in guarding the rights of an individual; in fact, it has been frequently the only haven of the weak and oppressed. It is earnestly submitted that this is a case where the writ should be granted, and a full investigation made of the action of the Court of Appeals in refusing to protect these respondents and in justifying this refusal on unsound reasoning.

Respectfully submitted,

GEORGE M. LANNING,
BARRON F. BLACK,
HUGH S. MEREDITH,
Counsel for Petitioners.

Sample Copy of Wage Account Form

S.S. **No.**

Voyage No.:

From.....

to.....

Statement of Account of.....

Employed as.....

From..... 19....., to.....19.....

at monthly wages of.....

paid up to....., on the.....19.....

Reason of settlement.....

General Conduct during Employment.....

.....

Wages earned for..... months..... days.....		$.....
Other Earnings (except overtime).....		.....
.....		" .....
TOTAL EARNED		$.....
LESS DEDUCTIONS		
Advance at beginning of voyage.....	"	
Advances taken during the voyage.....	$.....	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
at.....	"	
Cigarettes.....	"	
Penalties.....	"	
Total deductions.....		$.....
BALANCE.....		$.....
Plus Overtime per list attached.....		" .....
Particular payment / deduction		$.....
		" .....
BALANCE DUE AT DAY OF SETTLEMENT.....		$.....
at..... on.....		

I hereby declare that I have been paid at..... on.....

.....

and that having received all wages and other sums due me, I have no further claim against the S.S.....her owners, agents or managers.

at..... 19 .....